

STATEMENT OF WORK
ROCKY FLATS PLANT
OPERABLE UNIT 16
LOW PRIORITY SITES
NO FURTHER ACTION JUSTIFICATION DOCUMENT

EG&G ROCKY FLATS INC.
ROCKY FLATS PLANT
GOLDEN, COLORADO

PREPARED BY

ENVIRONMENTAL MANAGEMENT DEPARTMENT
REMEDIAL PROGRAMS DIVISION

NOVEMBER 20, 1991

APPROVED:

Randy T. Oger 4/24/92

REVIEWED FOR CLASSIFICATION

BY: Not Applicable per classification
DATE: office exemption (see attached)

ADMIN RECORD

REVIEWED FOR DISSEM. INFORMATION
BY: <u>820</u>
DATE: <u>6-22-97</u>

**STATEMENT OF WORK
ROCKY FLATS PLANT
OPERABLE UNIT 16
LOW PRIORITY SITES
NO FURTHER ACTION JUSTIFICATION DOCUMENT**

1.0 OBJECTIVE

The objective of this project is to prepare a "No Further Action Justification Document" for Operable Unit 16, Low Priority Sites, that complies with regulatory guidance documents and incorporates agency (Environmental Protection Agency [EPA] and Colorado Department of Health [CDH]) comments.

2.0 SCOPE

This Statement of Work (SOW) describes the requirements for the preparation of the Draft Low Priority Sites (LPS) document, Operable Unit Number 16, (OU 16). OU 16 is comprised of Individual Hazardous Substance Site (IHSS) Number 185, 182, 193, 194, 195, 196, and 197. The documentation and data presented in this document will determine whether or not further action is necessary.

3.0 BACKGROUND AND APPLICABLE DOCUMENTS

3.1 BACKGROUND

The LPS consists of reported minor spills of varying amounts in each of the IHSSs. The contaminants of concern range from solvent spills to steam condensate leak. It is anticipated that some of the IHSSs will need further investigation.

3.2 APPLICABLE DOCUMENTS

The subcontractor shall utilize the following regulatory documents in preparation of the Draft Work Plan for OU 16:

Draft Remedial Investigation and Study Plans for Low Priority Sites, Volume I, II, and III, U. S. Department of Energy, Rocky Flats Plant, June 1, 1988

Albuquerque Operations Office Environment, Safety, and Health Division Environmental Programs Branch, Comprehensive Environmental Assessment and Response Program, Phase 1 Installation Assessment, Rocky Flats Plant
April 1986

Rocky Flats Interagency Agreement, January 22, 1991

The IAG Historical Site Release Report (HSRR), currently in draft stage

US EPA, Interim Final RCRA Facility Investigation (RFI) Guidance, EPA 530-89-031, May 1989

US EPA, Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, Interim Final, EPA 540 G-89-004, October 1988

US EPA, Data Quality Objectives for Remedial Response Activities, Developmental Process, March 1987

US EPA, Data Quality Objectives for Remedial Response Activities, Example Scenario, March 1987

US EPA, Guidance for Data Usability in Risk Assessment, October 1990

US EPA, Risk Assessment Guidance for Superfund, Volume I, Human Health Evaluation Manual, (Part A), Interim Final, EPA 540/1-89/002, December 1989

US EPA, Risk Assessment Guidance for Superfund, Volume II, Environmental Evaluation Manual, Interim Final, EPA/540/1-89/001, March 1989

US EPA, Ecological Assessments of Hazardous Waste Sites: A Field and Laboratory Reference, EPA/600/3-89/013, March 1989

Code of Federal Regulations, Title 40, Part 265 - Interim Status
Standards for Owners and Operators of Hazardous Waste
Treatment, Storage and Disposal Facilities, July 1990

Code of Federal Regulations, Title 43, Part 11 - Natural Resource
Damage Assessments, October 1987 (or latest edition)

4.0 TECHNICAL REQUIREMENTS/TASKS

- 4.1 The subcontractor shall provide all materials, personnel and services required to prepare the final document for OU 16. The subcontractor shall be responsible for all aspects of the document in this SOW, except those sections specifically stated as provided by the EG&G Contractor Technical Representative (CTR). This SOW contains requirements for the work plan, but does not include reference material, guidance documents, and historical reports, which can be obtained upon request from EG&G CTR. A document shall be prepared which insures the LPS areas are fully investigated, all required information and data is generated during this investigation.
- 4.2 The No Further Action Justification Document shall include the following:
- 4.2.1 Introduction
Discuss the purpose of the investigation, pertinent regulatory requirements, overall scope of the project, existing environmental programs at RFP, previous environmental investigations at the site and all information required to give the reader a brief synopsis of the project scope.
- 4.2.2 Description of Current Conditions (photos should be used where available)
Include discussion on the following:
- 4.2.2.1 Facility Background - Include history and current land use.
- 4.2.2.2 Physical Setting - this should be information specific to the OU within the facility.
- 4.2.2.3 Surrounding Land Use
- 4.2.2.4 Ecology
- 4.2.2.5 History of Operations at the OU - Evaluate all historical RFP documents pertaining to OU construction and or operations, which may include a literature search for documents not listed in in section 3.2. This section should also include detailed discussion of waste streams discharged at the IHSSs.
- 4.2.2.6 Previous Investigations - Discuss previous investigations conducted at the site, the findings of those investigations, and the

validity of the results. Maps depicting previous borings and/or monitoring well locations shall be included.

4.2.2.7 Physical Characteristics-Discuss surface conditions (drainage, soils, etc.), geology, hydrogeology, description of structures, air flow patterns, etc.

4.2.2.8 Nature and Extent of Contamination-Historical data and pertinent information on OU 16 should be compiled and assessed to thoroughly describe the history and physical setting of the individual IHSSs if it bears directly on the objectives for this Work Plan. Previous investigations that include evaluation of soil, sediment, surface water and ground water data should be carefully examined. Historical and recent reports must be examined and the data extracted and analyzed. The data analysis shall focus on concisely describing the geochemistry of the IHSSs in OU16 and determining whether the historical data is sufficient to determine if no further action is justified.

A summary shall be made which identifies all possible source areas of contamination. This summary shall include: location of area (IHSS, spill area, etc.), quantities of solid or hazardous waste, hazardous waste or constituents, to the extent known, and any data gaps requiring additional information.

4.2.3 Document Schedule-A detailed schedule shall be developed including dates for submittal of various components of the No Further Action Justification Document, dates for starting and accomplishing specific tasks associated with the No Justification Document, and dates for reporting information from specific tasks. Personnel and resources necessary should be loaded onto the schedule to determine personnel and resource requirements. Organizational charts should also be included to show the types of personnel necessary to accomplish the tasks required.

5.0 REPORTS, DATA AND OTHER DELIVERABLES

5.1 All deliverables shall be completed by the scheduled deadlines.

<u>START</u>	<u>FINISH</u>	<u>ACTIVITY</u>
3/4/92	6/2/92	Agency review of Draft No Further Action Justification Document
5/15/92	7/20/92	Prepare final No Further Action Justification Document
7/20/92		Submit final No Further Action Justification Document
7/31/92	8/28/92	Agency Review and Approval

5.2 The subcontractor shall be responsible for attending scoping meetings with the CTR team members and/or regulatory agency personnel as directed by the CTR. The subcontractor shall be responsible for participating in meetings during the comment resolution period. The subcontractor shall prepare meeting minutes to document all meetings with CTR project team members and agency personnel. The typed minutes are due to the CTR within one week of the meeting date. Review meetings other than the ones detailed may be required. Meetings shall be approved by the CTR.

5.3 Fifteen copies of the first draft of the revised document shall be submitted to CTR by close of business on July 20, 1992. This document shall have incorporated EG&G, DOE, CDH and EPAs comments. The EPA and CDH will then review and approve the document. If EPA and CDH do not approve this document, an additional one or two more revisions shall be required. Transmittal of all documents to EG&G must have a written record in memos, meeting minutes or transmittal letter. Draft copies of each section of the No Further Action Justification Document, as they are completed, shall be submitted to EG&G for review and comment. Submittal of the sections in draft will expedite the final review process. Electronic copies of the final document (text and figures) shall be provided to EG&G on software compatible with that available at EG&G.

5.4 The subcontractor's participation in comment review meetings on the work plans shall include preparing written responses to comments and preparation of final Document addressing agency comments as required. A schedule for resolving comments during each comment period will be decided with the subcontractor after receipt of comments.

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- 5.6 The subcontractor shall prepare and submit Monthly Status Reports (Attached) to the CTR, and to the Resources and Information Management Department within three working days after the fifteenth day of each month for the preceding month.

MONTHLY TASK ORDER STATUS REPORT

Task Order Number:

Task Order Title:

Month and Year of this Status Report:

Award Date of Task Order:

Expiration Date of Task Order:

Task Order Funding:

- 1) Initial funding:
- 2) Modification funding:
(if applicable)
- 3) Revised total funding:
(if applicable)

Amount Incurred to Date:

Total Amount Invoiced to Date:

Date and Number of Last Invoice:

Percentage of Work Effort Completed:

Status:

(Suggested length of two paragraphs)